

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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BOGUSLAW KWASNIAK AND
MALGORZATA KWASNIAK,

Plaintiffs,

07CV05300

against

ANSWER TO
AMENDED
COMPLAINT

100 CHURCH, LLC, ALAN KASMAN DBA
KASCO, AMBIENT GROUP, INC., ANN
TAYLOR STORES CORPORATION, BATTERY
PARK CITY AUTHORITY, BFP ONE LIBERTY
PLAZA CO., LLC,,
BLACKMON-MOORING STEAMATIC CATASTOPHE, INC.
D/B/A BMS CAT, BOARD OF MANAGERS OF THE
HUDSON VIEW EAST CONDOMINIUM,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP,
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS INC., CUNNINGHAM
DUCT CLEANING CO., INC., ENVIROTECH
CLEAN AIR, INC., GENERAL RE SERVICES
CORP., GPS ENVIRONMENTAL
CONSULTANTS, INC., HILLMAN
ENVIRONMENTAL GROUP, LLC., HUDSON
VIEW EAST CONDOMINIUM, HUDSON VIEW
TOWERS ASSOCIATES, INDOOR AIR
PROFESSIONALS, INC., INDOOR
ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO., LAW
ENGINEERING P.C., LIBERTY VIEW
ASSOCIATES, L.P., MERRILL LYNCH & CO,
INC., NATIONAL ASSOCIATION OF
SECURITIES DEALERS, INC., NEW LIBERTY
PLAZA LP, NEW YORK CITY INDUSTRIAL
DEVELOPMENT AGENCY, NEW YORK CITY
INDUSTRIAL DEVELOPMENT CORPORATION,

NOMURA HOLDING AMERICA, INC.,
 NOMURA SECURITIES INTERNATIONAL,
 INC., ONE LIBERTY PLAZA, ONE WALL
 STREET HOLDINGS, LLC., R Y
 MANAGEMENT CO., INC., RELATED BPC
 ASSOCIATES, INC., RELATED
 MANAGEMENT CO., LP, ROYAL AND
 SUNALLIANCE INSURANCE GROUP, PLC, RY
 MANAGEMENT, ST. JOHN'S UNIVERSITY,
 STRUCTURE TONE (UK), INC., STRUCTURE
 TONE GLOBAL SERVICES, INC., THE BANK
 OF NEW YORK COMPANY, INC., THE BOARD
 OF MANAGERS OF THE ONE LIBERTY
 PLAZA CONDOMINIUM (CONDO #1178), THE
 ONE LIBERTY PLAZA CONDOMINIUM
 (CONDO #1178), THE RELATED COMPANIES,
 LP, THE RELATED REALTY GROUP, INC.,
 TOSCORP INC., TRC ENGINEERS, INC.,
 TUCKER ANTHONY, INC., WESTON
 SOLUTIONS, INC., WFP ONE LIBERTY PLAZA
 CO., ER, WFP ONE LIBERTY PLAZA, CO. GP,
 CORP., WFP TOWER A CO., WFP TOWER A
 CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP
 TOWER B CO. G.P. CORP., WFP TOWER B
 HOLDING CO., LP, WFP TOWER B. CO., L.P.,
 WFP TOWER D CO. G.P. CORP., WFP TOWER
 D HOLDING CO. I L.P., WFP TOWER D
 HOLDING CO. II L.P., WFP TOWER D
 HOLDING I G, ET AL

Defendants.

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 PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as
 and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off
 Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts
 Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the
 matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102
 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-

captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
April 1, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY:


Heather L. Smar (4622)